

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AMO DEVELOPMENT, LLC, AMO
MANUFACTURING USA, LLC and
AMO SALES AND SERVICE, INC.,

Plaintiffs,

v.

C.A. No. 20-842-CFC-JLH

ALCON VISION, LLC, ALCON
LABORATORIES, INC. and ALCON
RESEARCH, LLC,

Defendants.

ALCON INC., ALCON RESEARCH,
LLC, and ALCON VISION, LLC,

Plaintiffs,

v.

AMO DEVELOPMENT, LLC,
AMO MANUFACTURING USA, LLC,
AMO SALES AND SERVICE, INC.,
and JOHNSON & JOHNSON
SURGICAL VISION, INC.,

Defendants.

**JOINT MOTION FOR A TELECONFERENCE
TO RESOLVE A DISCOVERY DISPUTE**

Defendants/Counterclaim-Plaintiffs (collectively, “Alcon”) respectfully move the Court to schedule a teleconference to address outstanding discovery disputes. The parties have the following dispute:

1. Whether J&J Vision should be ordered to produce (in whole or redacted form) a report drafted by a software developer in connection with the 2014 inspection of the LenSx system.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in telephonic meet-and-confers on one or more of the above issues on at least the following dates: February 18, 2022.

Delaware Counsel:

Defendants/Counterclaim Plaintiffs: John W. Shaw

Plaintiffs/Counterclaim Defendants: Anthony Raucci

Lead Counsel:

Defendants/Counterclaim Plaintiffs: Noah S. Frank

Plaintiffs/Counterclaim Defendants: P. Anthony Sammi

The parties are available for a teleconference on the following dates: March 14 or 15, 2022.

/s/ Anthony D. Raucci

Jack B. Blumenfeld (No. 1014)
Brian P. Egan (No. 6227)
Anthony D. Raucci (No. 5948)
MORRIS, NICHOLS, ARSHT &
TUNNELL LLP
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
began@morrisnichols.com
araucci@morrisnichols.com

*Attorneys for Plaintiffs and
Counterclaim Defendants AMO
Development, LLC, AMO
Manufacturing USA, LLC, AMO
Sales and Service, Inc. and Johnson
& Johnson Surgical Vision, Inc.*

/s/ John W. Shaw

John W. Shaw (No. 3362)
Karen E. Keller (No. 4489)
Andrew E. Russell (No. 5382)
Nathan R. Hoeschen (No. 6232)
SHAW KELLER LLP
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0700
jshaw@shawkeller.com
kkeller@shawkeller.com
arussell@shawkeller.com
nhoeschen@shawkeller.com

*Attorneys for Defendants and
Counterclaim Plaintiffs Alcon Inc.,
Alcon Vision, LLC, Alcon Laboratories, Inc.
and Alcon Research, LLC*

Dated: February 23, 2022